

Margetta Langlois

vs.

Commonwealth of Massachusetts, Tom Reilly,  
individually and as District Attorney  
February 28, 1996 to September 12, 1999.

and

Martha Coakley, individually and as District Attorney  
January 20, 1999 to Present (May 2006).

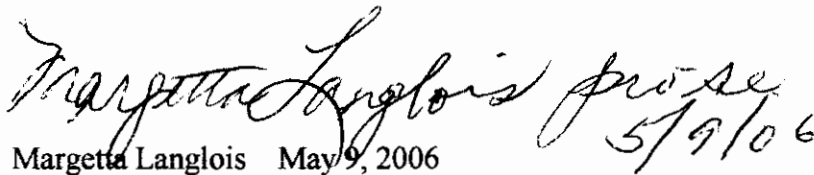
CASE NO. 2005-CV-10190-RWZOBEL RE: PROSECUTIONAL MISCONDUCT.

**Amended Complaint:** To the summonses to the above Defendants, Tom Reilly  
and Martha Coakley with 20 days to respond after received by signature of  
Receipt of Certified Mail.

Dear Clerk of Court,

Please set these papers before the Court as soon as possible at your earlier convenience  
for Request Motion to Reinstate Case in the above matter with this Amended Complaint  
added to the Service of Summonses by the U.S. Marshall of Boston to the above  
Defendants.

Respectfully Submitted,

  
Margetta Langlois May 9, 2006 5/9/06

cc: Tom Reilly, AG -Certified Mail with Signature

cc: Martha Coakley, DA - Certified Mail with Signature

cc: USDC Judge Zobel

cc: Civil Attorney

cc: Fox 25 Television

cc: Sondra, Client's Security Board

cc: Roger Geller, Bar Council

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**Amended Complaint:** To the summonses to the above Defendants, Tom Reilly  
and Martha Coakley.

NOW COMES, the Plaintiff, Margetta Langlois Pro Se, and placing this Amendment  
before the Court and to both the Defendants above to be answered back to the Court  
within 20 days of receipt of certified mail after being served the original summons by the  
U.S. MARSHALL OF BOSTON, MASSACHUSETTS.

Mr. Tom Reilly was served on May 2nd, 2006 at 5:02 p.m.

Ms. Martha Coakley has not been served as of May 8th, of 2006 due to her unavailability  
by the U.S. MARSHALL. Her summons is still in their custody as this present time.

- 1.) This suit concerns WRONGFUL IMPRISONMENT in MCI Framingham,  
Framingham, Massachusetts for 2 years and 1 day sentence.
- 2.) Commonwealth of Massachusetts, D.A. Tom Reilly was personally involved in the  
case of Massages. He was a client.
- 3.) On February 28th, 1996, I was falsely arrested along with Jodi Gagnon.
- 4.) It was proven in Court that Jodi Gagnon did not do anything wrong except a Massage  
without a license. The client/cop, Timothy Goulden perjured himself under oath at  
indictments in August of 1996 and again on July 7th and 8th of 1997. Under oath on the  
stand before Attorney William Keefe (McBride's ex-partner). Timothy Goulden testified  
under oath that he in fact solicited Jodi Gagnon and that he was completely naked.
- 5.) Commonwealth and the Lowell Police did not have a valid Search Warrant in hand on  
February 28th, 1996 when they entered the apartment at 1260 Westford Street, Apt. 9A,  
Lowell, Massachusetts before searching the apartment and ransacking it upside down  
(EXHIBIT AUDIO TAPE-COPS DOING ILLEGAL SEARCH AND SEIZE WITHOUT

A WARRANT).

6.) Marked money for Massage paid by the Officer, Timothy Goulden and was stolen out of the evidence room while in Lowell Police's custody.

7.) Lowell Police used Defendant, Margetta Langlois' money out of her Jeep during an illegal Search and Seize-the \$778.00 she had marked on an envelope for her monthly bills (Water, Electric, Rent, Ad and Telephone). That was illegally taken by the Lowell Police, the envelope disappeared, Clerk of Court, Charles Patsourakis at Lowell District Court demanded the money be given back due to there was no Search Warrant for the Jeep to be Searched.

8.) \$600.00 was only given back to Margetta Langlois and \$178.00 was kept in evidence and showed up at the Trial due to the fact the marked money was stolen? Massage was \$150.00 not \$178.00.

9.) Added evidence-6 condoms were not in evidence room when Attorney, Richard Davidson, Defendant, Margetta Langlois and Katherine Hatch (Defendant's daughter) before Officers, Kelly Richardson and Timothy Goulden and were all present, no condoms were in the boxes but were listed on the Search Warrant on March 6, 1996. Then received by the Lowell Police Department 8 days later.

10.) Margetta had 13-15 Judges on this case and nobody wanted it. She was thrown from Judge to Judge to resolve this matter. Due to no Judge ever sitting on this case twice.

11.) Margetta had 9 Attorneys total which Mr. Davidson (Second Attorney) withdrew to become a Witness to this case due to the Corruption and Loss/Tampered, Withheld (the Audio Tape never marked in as Evidence at Lowell Police Department but taken from the Defendant's Apartment this would show that Lowell Police conducted an illegal Search in Defendant's Apartment), Exculpatory Evidence, Added Evidence, Missing Evidence, Switched Evidence while in the Commonwealth's Possession. This would clear Margetta Langlois of all charges.

12.) The only charge that Margetta would face is having Massages without a license- which would constitute a misdemeanor and a fine, **not 2 years and 1 day prison.**

13.) On July 7th and 8th of 1997 it was proven by Attorney, Billy Keefe

a. False and Distorted Indictments by the Lowell Police, Commonwealth's Witnesses to indict Margetta on False Charges were proven that the Officer Timothy Goulden committed perjury and was suppressed.

b. False and Destroyed Evidence:

1.) List for Massages by Telephone for appointments that day with Clerk of Court's, Warren DeSaulner of Lowell District Court for 4 p.m. along with others disappeared and destroyed.

2.) Pages were ripped out of haircut book and personal phone book for

30 years of Friends, Family Members, etc. NOT CUSTOMERS! The pages were switched from one book to another. Mr. Tom Reilly's name was in the book and not pulled out until we appeared at Middlesex Superior Court, Cambridge, Massachusetts. Where I said to the Officer, Kelly Richardson "Why did they leave Tom Reilly's name in there? Do they not like him?" At the next hearing at Court, the page was torn out. Also, the False and Destroyed Evidence was suppressed.

c. False and Forged Statements were proven not to be Defendant's signature. Even though a Handwriting Expert was allowed and paid by the Commonwealth, there was no Handwriting Expert that was present to testify. It was suppressed.

14.) John C. McBride threw me into a Trial on September 11, 1997 where I had asked him "What had happened to my 20+ witnesses?" In the Judge, Malcolm Graham's Chambers was only me, the Defendant, the ADA Yvonne Bellafontaine, Judge's Clerk, Attorney McBride, the Judge and the Newspaper Reporter. This was not a Legal and Fair Trial due to McBride and the Commonwealth collaborating to manufacture and make the case stick with Prostitution and maintaining.

15.) McBride did not allow the Audio Tape for the Lowell Police conducting the Illegal Search and Seize without the Warrant but they were caught on tape.

16.) McBride even admitted that there was no crime committed on September 12, 1997. Due to McBride needed a favor from the Lowell Police Department to keep Lowell Police Officer, Archie Beaulier off his back due to John C. McBride having Sexual Relationship with Caroline Willard (Archie Beaulier's Girlfriend).

17.) McBride needed to sell me out due to a personal favor needed by Lowell Police, McBride unsuppressed all evidence that was illegal and false to find Defendant guilty. Archie Beaulier was forced to retire.

18.) Billy Keefe, ex-partner of John C. McBride told me that in the 7 times that he contacted me within 45 minutes at my friend's apartment 'McBride needed my case and that my case was all about drugs, not prostitution'.

19.) Judge Malcolm Graham stated:

- a. Conflicting testimonies of the Commonwealth's Witnesses (3-4 Police Officers that testified).
- b. Big Discrepancies in the money paid for the Massage.

20.) Attorney Richard Davidson testified on my behalf due to my innocence, he withdrew to become my Witness because I needed him more as a Witness to show proof of Tampered Evidence while in the Commonwealth's possession rather than to be a Defense Attorney. Attorney Richard Davidson put his License, Reputation and Name on the line for me knowing that I was innocent of all charges and how the Commonwealth



manipulated the Courts into filing false charges and with no reasons to arrest at the time of arrest. No Arrest Warrants ever issued.

21.) John C. McBride had promised me when I retained him that my case was about drugs, not prostitution because I showed him proof of affidavits from airport security that I had been stopped and searched and nothing found in my baggage on the dates of January 13th of 1997 and also on June 10th of 1997 from Tampa stating "I was put into the computer and nothing found in baggage".

Obviously, no costumers were found in the suitcase and NO DRUGS.

22.) When Police Officers came into my apartment on February 28th, 1996, the Police Officers questioned the girls that were there if they knew of any drug dealers, anyone selling drugs, etc. No drugs were found on the premises and nobody did drugs.

23.) Whereas Defendant did not have a Legal and Fair Trial with Witnesses (20+) Audio Tape of Officers doing Illegal Search and Seize with no Legal Warrant. Marked Money missing and all EXCULPATORY EVIDENCE withheld by the Commonwealth, Lowell Police and John C. McBride. Defendant never would have been found guilty. That is why Defendant has been violated her Civil Rights to receive a new trial with all evidence that has been withheld.

24.) Therefore, Defendant, Margetta Langlois demands Damages, All Filing Fees, Attorney's Fees (if necessary), Depositions Fees (if necessary) in the Amount of \$500,000.00 (Five Hundred Thousand Dollars) plus all expenses above and interest of the \$500,000.00 back to February 28th, 1996 when Falsely Arrested and Wrongfully Imprisoned for 2 years and 1 day.

25.) Defendant's demands a Trial by Jury, whereas, John C. McBride talked Defendant into a Trial by Judge and not to take the stand on September 11th and 12th of 1997.

26.) I, Margetta Langlois sign under the Pains and Penalties of Perjury.

Respectfully Submitted,

A handwritten signature in cursive script that reads "Margetta Langlois Pro se". To the right of the signature, the date "5/9/06" is written in a similar cursive style.

Margetta Langlois May 9, 2006

cc: Tom Reilly, AG -Certified Mail with Signature

cc: Martha Coakley, DA - Certified Mail with Signature

cc: USDC Judge Zobel

cc: Civil Attorney

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